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11 *Counsel for Proposed Defendant-Intervenor Little Sisters of the Poor, St. Mary's Home*

12 **IN THE UNITED STATES DISTRICT COURT**  
13 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

14 STATE OF CALIFORNIA, *et al.*,

Plaintiffs,

15 v.

16 XAVIER BECERRA, Secretary of Health and  
Human Services, *et al.*,

17 Defendants,

18 and,

19 THE LITTLE SISTERS OF THE POOR,  
20 JEANNE JUGAN RESIDENCE, *et al.*,

Defendant-Intervenors.

Case No. 4:17-cv-05783-HSG

**SECOND DECLARATION OF  
MOTHER PROVINCIAL JULIE  
MARIE HORSEMAN**

1 I, Mother Provincial Julie Marie Horseman, hereby declare as follows:

2 1. I am over the age of 21 and am capable of making this declaration pursuant to  
3 28 U.S.C. § 1746. I have not been convicted of a felony or crime involving dishonesty. I  
4 make this declaration based on my personal knowledge and experience of the Little  
5 Sisters, our organization, our ministry, and our religious beliefs and practices.

6 2. I am the Mother Provincial of the Chicago Province of the Little Sisters of the  
7 Poor. The Chicago Province includes Little Sisters homes in Illinois, Colorado, New  
8 Mexico, Missouri, Kentucky, Minnesota, and California.

9 3. I have been a Little Sister for 23 years and have served in leadership positions  
10 in the order for 6 years. I became Mother Provincial in 2021.

11 4. As Mother Provincial for the Chicago Province, I am responsible for overseeing  
12 the Jeanne Jugan Residence of the Little Sisters in San Pedro, California (“the San Pedro  
13 Home”), which I understand is the Little Sisters’ home that intervened in this litigation.

14 5. I understand that, while this case has been pending at the California district  
15 court following the Supreme Court’s decision, the San Pedro Home has explored the  
16 possibility of a sale due to changes unrelated to this litigation.

17 6. I understand that the San Pedro Home has been moving forward with a potential  
18 sale of the Home.

19 7. At this time, the San Pedro Home has closed its skilled nursing unit and  
20 absorbed most of the unit’s residents into the assisted living unit in the Home.

21 8. The San Pedro Home is working toward entering into a management agreement  
22 of the assisted living unit with a potential buyer. The management company will provide  
23 all the employees for the facility.

1       9. A prior sale of the San Pedro Home to the same potential buyer was canceled  
2 due to environmental issues that we became aware of on the property. That cancelation  
3 resulted in a letter from Fr. Mark Cregan to the California Attorney General  
4 withdrawing notice of the proposed sale on March 28, 2022.

5       10. The San Pedro Home still intends to move forward with a sale of the property to  
6 the potential buyer once the environmental issues have been resolved.

7       11. At this time, I still believe a sale will take place within six months to a year,  
8 depending on the regulatory process.

9       12. I understand that the corporate entity—the Jeanne Jugan Residence of the  
10 Little Sisters of the Poor in San Pedro, California—would continue to exist following any  
11 potential sale but would experience a drastic and possibly complete reduction in its  
12 employee workforce. While it is possible the San Pedro Home would later acquire another  
13 facility and resume operations, there is no guarantee they will ever do so.

14       13. If the district court permits the Little Sisters Chicago to intervene on the  
15 condition that the San Pedro Home withdraw from the litigation, the San Pedro Home  
16 is willing to withdraw from the litigation after intervention is granted to the Little  
17 Sisters Chicago.

1 I declare under penalty of perjury under the laws of the United States that the  
2 foregoing is true and correct.

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4 Executed this 23th day of September, 2022,

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6 Mother Provincial Julie Marie Horseman  
7 Mother Provincial Julie Marie Horseman  
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